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October 13, 2023

Via Electronic Filing

The HON. Pamela K. Chen
United States District Court Judge
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

The HON. Peggy Kuo
United States Magistrate Judge
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Riera v. Williamsburg Material Corp. et al*
Case No.: 1:22-cv-06237-PKC-PK

Your Honors:

This law firm has been retained and now represents Williamsburg Materials Corp. and Franco Pallone individually, defendants in the above captioned matter. A Notice of Appearance was filed on behalf of defendants earlier today.

Pursuant to Judge Pamela K. Chen's Individual Practices and Rules, specifically 1 (G) and 2 (A), this letter respectfully serves to request an extension of time to file an Answer in this matter, and otherwise attempt to negotiate a resolution, for a period of thirty days from October 20, 2023, the date on which a deadline exists for Plaintiffs to file their Motion for Default Judgment.

Defendants, pursuant to discussions and agreement with Plaintiffs' counsel, consent to waive any objections to service of process on Defendants collectively and agree to accept such service of process.

This is Defendants' first such request in the above matter.

Defendants respectfully request that this application be approved. Thank you for your consideration.

Respectfully submitted,
/s/ Joseph F. Tremiti
Joseph F. Tremiti, Esq.
Counsel for Defendants

Cc: Via ECF to all counsel of record